

REMARKS

The Office Action dated October 19, 2005 has been received and carefully noted. The following remarks are submitted as a full and complete response thereto. Claims 1-12 are currently pending in the application and are respectfully submitted for consideration.

The Office Action rejected claims 1-12 under 35 U.S.C. §102(e) as being anticipated by Toga (U.S. Patent No. 6,832,256). The rejection is respectfully traversed for the reasons which follow.

Claim 1, upon which claims 2 and 3 are dependent, recites a system of switches. The system includes a memory/command bus having a first interface, a second interface and a third interface, and a memory connected to the third interface of the memory/command bus, the memory having a first memory address. The system further includes a first switch that monitors the memory/command bus and interprets information written to the first memory address as proxy information, the first switch connected to the first interface of the memory/command bus, and a second switch that monitors the memory/command bus and interprets information written to the first memory address as proxy information, the second switch connected to the second interface of the memory/command bus.

Claim 4, upon which claims 5-9 are dependent, recites a switch including a memory/command bus interface, the memory/command bus interface configured to be connected to a memory and a second switch through a memory/command bus, the

memory having a designated memory address. The switch also includes a monitor connected to the memory/command bus interface so that the monitor can monitor the memory/command bus and interpret information written to the designated memory address as proxy information.

Claim 10, upon which claims 11 and 12 are dependent, recites a method of sending information between switches using a shared memory/command bus connecting the switches to one another and to a shared memory. The method includes the steps of allocating a first address in the shared memory for communicating information between switches, obtaining ownership of the memory/command bus for a first switch, writing memory information to the shared memory from the first switch, writing sending information, to be sent to other switches, to said first address in said shared memory, monitoring of the memory/command bus by the first switch and the other switches, and interpreting the sending information written to the first address as proxy information.

As will be discussed below, Toga fails to disclose or suggest all of the elements of the claims, and therefore fails to provide the features discussed above.

Toga discloses a method of controlling data transfer between a first network and a second network of computers. Protocol exchanges received from the first network by the second network are parsed and interpreted to determine requests within the application protocol. The second network makes a completion decision as to whether to allow the commands based on the protocol information. The second network of computers can allow for complete exchange or partial exchange between the applications. Additionally,

the second network may deny the exchange until a later time or it may cache the exchange to allow its clients to access the data from the transfer without the need for retrieving the data again from the first network.

Applicants respectfully submit that Toga fails to disclose or suggest critical and non-obvious elements of the present claims. For example, Toga does not disclose or suggest “a memory connected to said third interface of said memory/command bus, said memory having a first memory address,” as recited in claim 1. Toga also fails to disclose or suggest a memory connected to the memory/command bus interface and having a designated memory address, as recited in claim 4. Similarly, Toga fails to disclose or suggest allocating a first address in the shared memory for communicating information between switches and writing memory information to the shared memory from the first switch, as recited in claim 10.

Toga does not disclose or suggest a memory with the claimed limitations as discussed above. Toga only generally describes the possibility of caching an exchange between applications. Specifically, Toga teaches that the proxy 22 may cache the file to allow its clients to access the file from the transfer without the need to retrieve the file a second time from the Internet. Toga, however, does not disclose or suggest that the memory is connected to an interface of a memory/command bus, that a first address is allocated in the memory for communicating information between switches, or that memory information is written to the memory from a first switch, as recited in claims 1, 4, and 10. In fact, Toga does not even mention the use of switches, and therefore cannot

disclose or suggest writing information from the switch to the memory. Therefore, Toga does not disclose or suggest at least this element of the claims.

Furthermore, Applicants respectfully submit that Toga fails to disclose or suggest a switch or monitor that interprets information written to the memory address as proxy information, as recited in present claims 1, 4, and 10. The Office Action appears to be taking the position that the proxy 22 disclosed by Toga corresponds to the proxy information of the present invention. Applicants respectfully disagree. Toga teaches that the proxy 22 is an element which actively monitors and interprets the protocol exchanges between the Internet. The proxy 22 of Toga looks at session information and specific commands used during the protocol exchange, and determines completion decisions about whether to allow the command to complete based upon the information within the protocol. Although they may have similar nomenclature, the proxy 22 of Toga does not correspond to the proxy information of the claimed invention.

According to an embodiment of the claimed invention, as illustrated in Figure 5, the memory/command bus 530 may be used to send commands between switch 510 and switch 520 during a write to ATM memory 535. Information or commands are written to a specific address A in ATM memory 535 during write cycles. Switches 510 and 520 will recognize write operations to address A as a command during a write cycle. Information written to address A is called proxy information, which is defined as information written to memory that is not interpreted by a switch as information being written to memory. Instead, the switch interprets proxy information being written to

memory as commands, status information that a switch may use to set a register or LED, or other types of information not typically written to memory. Applicants respectfully assert that Toga does not disclose or suggest that information written to memory may be interpreted as proxy information, and therefore does not disclose or suggest a switch or monitor that interprets information written to a memory address as proxy information.

For at least the reasons discussed above, Applicants respectfully submit that Toga does not disclose or suggest all of the elements of claim 1, 4, and 10. As such, Applicants respectfully request that the rejection of claims 1, 4, and 10 be reconsidered and withdrawn.

Additionally, claims 2-3, 5-9, and 11-12 are dependent upon claims 1, 4, and 10, respectively. Thus, claims 2-3, 5-9, and 11-12 should also be allowed for at least their dependence upon claims 1, 4, and 10, and for the specific limitations recited therein.

Applicants respectfully submit that the cited prior art fails to disclose or suggest critical and important elements of the claimed invention. These distinctions are more than sufficient to render the claimed invention unanticipated and unobvious. It is therefore respectfully requested that all of claims 1-12 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



Majid S. AlBassam
Registration No. 54,749

Customer No. 32294
SQUIRE, SANDERS & DEMPSEY LLP
14TH Floor
8000 Towers Crescent Drive
Tysons Corner, Virginia 22182-2700
Telephone: 703-720-7800
Fax: 703-720-7802

MSA:jf